

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE PETITION
OF KAVANAGH FISHERIES, INC.
OWNER OF THE F/V ATLANTIC
FOR EXONERATION FROM OR
LIMITATION OF LIABILITY

Civil Action No. 05-cv-10637-GAO

ZIM'S LR 16.1 CERTIFICATION

Attached is the Zim claimants' and counsel's signed certification.

RESPECTFULLY SUBMITTED this 16th day of May 2006.

DeORCHIS & PARTNERS, LLP
Attorneys for
Zim Integrated Shipping Services Ltd.
Zim American Integrated Services, Inc.

/s/ David J. Farrell, Jr.

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ZIM CLAIMANTS' LR 16.1 CERTIFICATION

Claimants Zim Integrated Shipping Services Ltd. and Zim American Integrated Services, Inc., by and through their undersigned authorized representative and counsel of record, affirm that we have conferred

- (a) with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and
- (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in LR 16.4.

/s/ Brian S. Jones
Brian S. Jones
V.P. Claims & Insurance
for
Zim Integrated Shipping Services Ltd.
Zim American Integrated Services, Inc.

/s/ David J. Farrell, Jr.
David J. Farrell, Jr.
BBO # 559847